

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
MONTGOMERY DIVISION**

DARREN ANDERSON, et al.,

Plaintiffs,

v.

WAYNE FARMS, LLC,

Defendant.

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**CIVIL ACTION NO.
2:06-cv-00951-MEF-DRB**

**NOTICE OF FILING ADDITIONAL NOTICES OF
CONSENT TO JOIN**

Plaintiff, DARREN ANDERSON, et al., gives notice of filing the attached Notices of Consent to Join executed by, EDWARD ANTHONY, ANNIE R. DAVIS, ANQUANIQUE DAVIS, SHANEKIA ETHERIDGE, KATRINA HOOKS, WALTER JILES, HANSON MACK, MICHAEL T. MAHONE, JAMES E. PITTS, SR., ANTHONY WILLIAMS, SPENCER JOHNSON JR., MARKEITH SCARVER and BENJAMIN WILLIAMS, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above-captioned lawsuit.

Dated: February 20, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203

(205) 930-6900 (Phone)

Lance H. Swanner

Samuel A. Cherry, Jr.

THE COCHRAN FIRM, P.C.

163 W. Main Street

P.O. Box 927

Dothan, AL 36302

(334) 793-1555 (Phone)

(334) 793-8280 (fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2007, I electronically filed the foregoing Motion with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Dorman Walker
dwalker@balch.com

Lisa J. Sharp
lsharp@balch.com

Wendy A. Madden
wmadden@balch.com

Pepper Crutcher, Jr.
pcrutcher@balch.com

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Edward Anthony states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs. I worked at this location from
[City/State]
1-16-1992 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Edward Anthony
[PRINT NAME]

Edward Anthony
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Annie R. Davis

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of Plant]
the facility located in Union Springs, AL I worked at this location from
[City/State]
04/26/98 to present
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of February, 2007.

Annie R. Davis

[PRINT NAME]

Annie R. Davis

[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Anquanique Davis states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs AL. I worked at this location from
[City/State]
Feb 2004 to April 2005.
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of September, 2006.

Anquanique Davis
[PRINT NAME]

Anquanique Davis
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Shanekia Etheridge states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of Plant]
the facility located in Union Springs, AL. I worked at this location from
[City/State]
5/18/2004 to 8/5/2004.
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of February, 2007.

Shanekia A. Etheridge
[PRINT NAME]

Shanekia A. Etheridge
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Katrina Hooks states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of Plant]
the facility located in Union Springs. I worked at this location from
[City/State]
3/8/06 to 8/1/06.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of February, 2007.

Katrina Hooks
[PRINT NAME]

Katrina Hooks
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Walter Siles states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at
[Name of plant]
the facility located in UNION SPRINGS, ALA. I worked at this location from
[City/State]
Sept. 03 to Present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in UNION SPRINGS, ALA. and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 8 day of DEC., 2006.

Walter Siles
[PRINT NAME]

Walter Siles
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Hanson Mack states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs, AL. I worked at this location from
[City/State]
9/5/05 to Present.
[Date] [Date, or if still working write "present"]
8/21/1989
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 3rd day of Sept., 2006. m

Hanson Mack
[PRINT NAME]

Hanson Mack
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Michael T. Mahone states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of Plant]
the facility located in Union Springs, AL I worked at this location from
[City/State]
01-21-99 to Present
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10th day of February, 2007.

Michael T. Mahone
[PRINT NAME]

[Signature]
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

James E. Pitts Sr. states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of Plant]
the facility located in Union Springs, AL I worked at this location from
[City/State]
01/16/1991 to Present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of February, 2007.

James E. Pitts
[PRINT NAME]

James E. Pitts
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Anthony Williams states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs AL I worked at this location from
[City/State]
Dec/05 to Present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Anthony Williams
[PRINT NAME]

Anthony Williams
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Spencer Johnson Jr. states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs, AL I worked at this location from
[City/State]
3/03/83 to Present 1/25/07
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of JANUARY, 2007.

SPENCER JOHNSON JR
[PRINT NAME]

Spencer Johnson Jr
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Marketh Scarver states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs AL. I worked at this location from
[City/State]
Sept 21, 2006 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of January, 2007
~~2006~~

Marketh Scarver
[PRINT NAME]

Marketh Scarver
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Benjamin Williams states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of plant]
the facility located in Union Springs, AL I worked at this location from
[City/State]
08/16/93 to present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19 day of January, 2007.

Benjamin Williams
[PRINT NAME]

Benjamin Williams
[SIGNATURE]